

MATTHEW C. ELLIS, OSB No. 075800

matthew@employmentlawpdx.com

Matthew C. Ellis, PC

621 SW Morrison St Ste 1025

Portland OR 97205

Telephone: 503/345-5407

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON**

LORI BELL, an individual,

Plaintiff,

v.

CLACKAMAS COUNTY, a local government,
and **GREG GEIST**, an individual,

Defendants.

CASE NO. 3:22-cv-01885-MO

**REPORT OF PARTIES RULE 26
CONFERENCE**

1. Pursuant to FRCP 26(f) , the parties conferred on the contents of this proposed discovery plan on February 13, 2023.
2. The parties jointly propose the following discovery plan:
 - a. Initial Disclosures pursuant to LR 26-7 due 30 days after Defendants' Answer, which is expected to be filed this week;
 - b. Fact discovery to be completed by August 17, 2023;
 - c. Dispositive motions, if any, to be filed by September 28, 2023;
 - d. Joint ADR Report due 30 days after rulings on summary judgment or, if no dispositive motions are filed, 30 days after the dispositive motion deadline;
 - e. Expert disclosures due 90 days prior to trial, with counter-designations of

rebuttal experts due 60 days prior to trial.

3. Consent to Magistrate: The parties discussed this topic and will file any consent forms in the appropriate manner by March 1, 2023.

DATED this 13th day of February, 2023.

s/Matthew C. Ellis

MATTHEW C. ELLIS, OSB No. 075800
Matthew C. Ellis, PC
621 SW Morrison, Ste 1025
Portland, OR 97205
(503) 345-5497
matthew@employmentlawpdx.com

Attorney for Plaintiff

s/Sarah D Foreman

SARAH D. FOREMAN, OSB No. 042859
Clackamas County Counsel
2051 Kaen Rd.
Oregon City, OR 97045
(503) 655-8363
sforeman@clackamas.us

Attorney for Defendants